

REMARKS/ARGUMENTS

Prior to this amendment, claims 1-26 were pending. In this amendment, claims 1, 17, and 19 are amended, no claims are canceled, and no claims are added. No new matter is added. Thus, after entry of this amendment, claims 1-26 are pending.

I. Claim Rejections under 35 USC § 103, Drake, Rasmussen, Sang-Kyun

Claims 1, 3, 5, 6, 14, 15, 17, 19 and 25-26 are rejected under 35 U.S.C. 103(a) as being obvious over *Drake* (U.S. Publication No. 2003/0070142), in view of *Rasmussen* (U.S. Patent No. 7,185,016), and further in view of Sang-Kyun Kim ("*Sang*") ("*Immediate and Partial Validation Mechanism for the Conflict Resolution of Update Operations in XML Databases.*"). Applicants respectfully submit that these references do not teach or suggest each element of these claims, as amended. This rejection is respectfully traversed.

For example, claim 1 as amended, recites in part, "*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context.*" Such a limitation is not taught or suggested by the cited references.

Drake teaches coupling validation with the relevant data values such that the validation becomes part of the data model (paragraph [0018]). *Drake* further teaches that the validation process can be done at an early point, such as where the data model is preloaded with data values (paragraph [0021]). In such a case, a complete validation is done with pre-populated data, which can be altered/mutated and another validation done (paragraph [0021]). *Drake* does not teach "*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context,*" as *Drake* describes validating an object containing data, where the validation rules are contained with the object. *Drake* does not teach or suggest retrieving a list of objects to be validated based on the first subject and the determined context, because *Drake* does not teach or suggest retrieving a list of objects from the database at all, for any purpose.

Combining *Rasmussen* with *Drake*, even if there were motivation to do so, would still not render obvious Applicants' claim 1. *Rasmussen* teaches transforming metadata models containing model objects in a reporting system (col. 1, lines 6-11; col. 3, lines 45-53), and is cited as teaching metadata being stored in databases (Office Action, pg. 7). Such teaching would at best store metadata for the *Drake* validation processes in a database, and still would not result in, or provide motivation for “*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context.*” The combination of *Rasmussen* with *Drake* would still not teach or suggest such a limitation, as neither reference describes retrieving a list of objects for validation from a database. The combination of *Rasmussen* with *Drake* at best describes validating a single object, the object being stored in a database. It would not be obvious to retrieve a list of objects for validation from a database given *Drake* and *Rasmussen* in combination, as the combination of those references would provide no reason to retrieve a list of objects, as the references combined are directed to validating a single object as the subject of validation. There would be no reason to retrieve a list of objects to be validated, as the retrieved single object would be the only object to validate.

Combining *Rasmussen* with *Drake* and *Sang*, even if there were motivation to do so, would still not render obvious Applicants' claim 1, as amended. *Sang* teaches a method of immediate and partial validation for conflict resolution of update operations in an XML database (Title, abstract) and is cited as teaching partial or complete validation (Office Action, pg. 8). *Sang* teaches a method for updating the content of an XML document (Page 389). A DTD (document type definition) file is parsed to determine the correct format for data elements in the XML document. (Page 389). The data element to be inserted is validated against this DTD to validate it follows the correct format as specified in the DTD. (page 391). If the data element is verified as correctly conforming to the DTD, the data element can be inserted into the XML document without having to validate the entire XML document (partial validation of the XML document). (page 389). *Sang* at best may describe a form of validation of a single XML document. *Sang* does not describe retrieving a list of objects (XML documents) from a database

in order to validate each object in the list of objects. As such, the combination of *Drake* with *Rasmussen* and *Sang* cannot teach or suggest “*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context,*” as the references in combination are directed to validating a single object. It would not be obvious to retrieve a list of objects to be validated, as once the subject object is presented, there would be no other objects requiring validation.

As such, the combination of *Rasmussen* with *Drake* and *Sang* cannot render obvious Applicants' claim 1 as amended, or the claims that depend therefrom. The remaining claims recite limitations that similarly are not rendered obvious by these references for reasons including those set forth above. Withdrawal of this rejection is respectfully requested.

II. Claim Rejections under 35 USC § 103, Drake, Rasmussen, Sang-Kyun, Mikhailov

Claims 2, 4, 18, and 20-21 are rejected under 35 U.S.C. §103(a) as being obvious over *Drake* and *Rasmussen* and *Sang* further in view of *Mikhailov* (US 6,968,500). These claims are not rendered obvious by *Drake* and *Rasmussen* and *Sang* as discussed above. Combining *Mikhailov* with these references, even if there were motivation to do so, still would not render these claims obvious. *Mikhailov* teaches an automatic forms handling system (col. 1, lines 8-15; col. 5, lines 19-38), and is cited as teaching a group of types of associated metadata (Office Action, pg. 16). A combination of these references still would not result in, or provide motivation for “*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context,*” as the combination of references would still be directed to validating an offered object, and would not teach or suggest retrieving a list of objects to be validated based on the offered object. Withdrawal of this rejection is respectfully requested.

III. Claim Rejections under 35 USC § 103, Drake, Rasmussen, Sang-Kyun, Lindberg

Claims 7-13, 16, and 22-24 are rejected under 35 U.S.C. §103(a) as being obvious over *Drake* and *Rasmussen* and *Sang* further in view of *Lindberg* (US 2003/0028540). These claims are not rendered obvious by *Drake* and *Rasmussen* and *Sang* as discussed above. Combining *Lindberg* with these references, even if there were motivation to do so, still would not render these claims obvious. *Lindberg* teaches a system for transferring information between a user interface and a database over a network (paragraph [0010]), and is cited as teaching a first subject as a root object for a collection of associated objects (Office Action, pg. 18). At best, *Lindberg* describes a hierarchical structure of objects. *Lindberg* does not teach or suggest “*querying the database to retrieve a list of objects requiring validation, the list of objects determined by the first subject of validation and the determined context.*” *Lindberg* does not describe retrieving a list of objects based on a subject of validation, and a determined context for validation. When combined with *Drake* and *Rasmussen* and *Sang*, such a limitation would still not be taught or suggested, as the combination of references would be directed to validating a single object, not using a single object to determine a list of objects that require validation. Withdrawal of this rejection is respectfully requested.

IV. Amendment to the Claims

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. Support for the amendments can be found throughout the specification, including places such as P[0044] and Figs. 2-3.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,

/Preetam B. Pagar/

Preetam B. Pagar
Reg. No. 57,684

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 415-576-0200 / Fax: 415-576-0300
PBP:scz
61869399 v1